

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARINE BANK, )  
                  )  
Plaintiff,     )       **Case No. 04 C 7001**  
                  )  
v.              )  
                  )  
MISS MIMI CORPORATION, an )  
Illinois Corporation; and GERARD M. )  
JACOBS, an individual,     )  
                  )  
Defendant.     )

**MOTION TO REVIVE AGREED JUDGMENT**

LINCOLNSHIRE ASSOCIATES II, LTD. (“Lincolnshire Associates”), by its attorneys, Levenfeld Pearlstein, LLC and pursuant to 735 ILCS 5/2-1602, hereby requests a revival of the Agreed Judgment entered in favor of MARINE BANK (“Marine”) and FIRST BANK, Successor in Interest to CIB Bank (“First Bank”) and against the Defendants, MISS MIMI CORPORATION (“Miss Mimi”); GERARD M. JACOBS (“Jacobs”); and non-party, T. BENJAMIN JENNINGS (“Jennings”), jointly and severally and in support thereof, states as follows:

1. On August 11, 2006, this Court entered an Agreed Judgment (“Judgment”) in favor of Marine Bank and First Bank and against Miss Mimi, Jacobs, and Jennings, jointly and severally, in the amount of \$12,000,000.00. A copy of the Judgment is attached hereto as **Exhibit A.**

2. On December 13, 2006, First Bank transferred and assigned the Judgment to Lincolnshire Associates (“Assignment of Judgment”). A copy of the Assignment of Judgment is attached hereto as **Exhibit B.**

3. Lincolnshire Associates is the sole owner and holder of the Judgment.
4. Multiple principal payments were made on the Judgment and as of April 20, 2015, the total amount of principal owed is \$1,328,480.67.
5. Interest accumulating on the judgment at the rate of nine percent (9%) per annum totals \$1,661,677.08 as of April 20, 2015, and continues to accrue thereafter at the rate of \$327.57 per diem. When added to the foregoing principal, \$2,990,157.75 remains due and owing on the Judgment as of April 20, 2015.

WHEREFORE, Lincolnshire Associates II, LTD. hereby requests that this Court revive the original Agreed Judgment entered on August 11, 2006 against Miss Mimi Corporation, Gerard M. Jacobs, and T. Benjamin Jennings in the amount of \$1,328,480.67, plus interest in the amount of \$1,661,677.08 as of April 20, 2015, and interest accruing thereafter at the rate of nine percent per annum, which is equal to \$327.57 per diem.

Respectfully Submitted,

**LINCOLNSHIRE ASSOCIATES  
II, LTD.**

By: /s/ Gary I. Blackman  
One of Its Attorneys

Gary I. Blackman  
LEVENFELD PEARLSTEIN, LLC  
2 North LaSalle Street, 13<sup>th</sup> Floor  
Chicago, Illinois 60602  
(312) 346-8380  
[gblackman@lplegal.com](mailto:gblackman@lplegal.com)